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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

29 AMERICAN FEDERATION OF  
30 GOVERNMENT EMPLOYEES, AFL-CIO;  
31 AMERICAN FEDERATION OF STATE  
32 COUNTY AND MUNICIPAL EMPLOYEES,  
33 AFL-CIO, et al.,

34 Plaintiffs,

35 v.

36 UNITED STATES OFFICE OF PERSONNEL  
37 MANAGEMENT, et al.,

38 Defendants.

39 Case No. 3:25-cv-01780-WHA

40 **PLAINTIFFS' MOTION TO SHORTEN  
41 TIME TO HEAR PLAINTIFFS' MOTION  
42 FOR LEAVE TO AMEND COMPLAINT,  
43 TO JOIN NEW PLAINTIFFS TO  
44 PRELIMINARY INJUNCTION MOTION,  
45 AND LEAVE TO FILE ADDITIONAL  
46 DECLARATION EVIDENCE**

47 Civil Local Rule 6-3

## **NOTICE OF MOTION AND MOTION**

PLEASE TAKE NOTICE THAT pursuant to Civil Local Rule 6-3, Plaintiffs bring this Motion to Shorten Time for briefing and hearing on Plaintiffs' Motion for Leave to Amend Complaint, to Join New Plaintiffs to Preliminary Injunction Motion, to File Additional Declaration Evidence ("Plaintiffs' Motion for Leave"). Specifically, Plaintiffs respectfully request that the Motion for Leave be heard as soon as the Court's schedule permits and that Defendants' response to Plaintiffs' Motion for Leave be due on or before March 6, 2025. Although Plaintiffs do not believe that a hearing on Plaintiffs' Motion for Leave is necessary, Plaintiffs respectfully request that any hearing be scheduled for March 7, 2025 and be held remotely.

In support of their request, Plaintiffs submit the attached Declaration of Danielle Leonard and state as follows:

Pursuant to this Court’s February 27, 2025 order, there is an evidentiary hearing set for March 13, 2025. As the amended complaint Plaintiffs propose to file sets forth in detail, Plaintiffs have identified since February 27, 2025 numerous potential additional Plaintiffs that have been uniquely injured by the mass termination policy challenged by this lawsuit. Plaintiffs have also identified, based on information newly provided by Defendants, numerous federal agencies that—as Plaintiffs will prove at the March 13, 2025 hearing—are implementing the unlawful policy challenged in this lawsuit and must be added as defendants in order for complete relief to be effectuated.

Plaintiffs will be substantially prejudiced if Plaintiffs' Motion to shorten time is not granted. The allegations and parties Plaintiffs propose to add will determine the parties' presentation of the evidence at the March 13, 2025 evidentiary hearing. If the Motion for Leave were to be briefed and decided on an ordinary schedule, the parties would be unable to prepare adequately for the March 13, 2025 hearing, and a ruling would not issue sufficiently in advance of that hearing to allow the full presentation of evidence and grant of necessary relief.

Pursuant to Civil Local Rule 6-3, Plaintiffs sought a stipulation from Defendants that would have made this motion unnecessary, but their efforts were unsuccessful. If this motion to shorten time is granted, this will be the first schedule modification in the case, whether by stipulation or court

1 order. The shortened time frame for Plaintiffs' Motion for Leave will not affect any other deadlines  
2 in this case.

3 On the basis of the foregoing showing of good cause, Plaintiffs respectfully request that the  
4 Court grant its request for an Order shortening time to hear Plaintiffs' Motion for Leave.

5 DATED: March 4, 2025

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